

Message

From: Sir, Haley [Haley.Sir@mt.gov]
Sent: 8/25/2020 5:25:53 PM
To: Llamozas, Emilio [Llamozas.Emilio@epa.gov]; jmay@mt.gov
Subject: RE: Question about Helena NPDES permit
Attachments: MT0022641sob.pdf

Hello Emilio,

Attached is the Statement of Basis for the last permit renewal.

I am unaware about the submittal dates for the last renewal and I am a little confused about the dates you have listed. I only have the information for the most recent renewal application (submitted in 2017). Perhaps Jeff knows more. But yes, you are correct; permittees are required to send in a renewal application 180 days before their permit expires.

Thank you,

Haley Sir
Water Quality Permit Writer
Water Protection Bureau
(406) 444-4626

From: Llamozas, Emilio [mailto:Llamozas.Emilio@epa.gov]
Sent: Tuesday, August 25, 2020 10:56 AM
To: Sir, Haley <Haley.Sir@mt.gov>; May, Jeff <jmay@mt.gov>
Subject: [EXTERNAL] RE: Question about Helena NPDES permit

Hi Haley and Jeff,

I hope you are well and staying safe. I emailed you a couple months ago about the Helena WWTP. I am the EPA pretreatment enforcement contact. I had a favor to ask of you. Could you please send me the statement of basis for the current Helena NPDES permit MT0022641?

Also, I was wondering if you could please help me with a question regarding the NPDES renewal application that was submitted at the end of the January 1, 1997 to October 31, 2001 permit. According to ICIS, the permit application was submitted on 02/22/2010. ICIS also indicated that the permit was deemed complete on 07/13/2010. Is that accurate? Should the City have submitted a permit application 180 days before the permit expiration on October 31, 2001?

Please feel free to call me with any questions.

Thanks,

Emilio Llamozas
(303) 312-6407 phone
To report an environmental violation, please visit EPA's website at
<http://www.epa.gov/compliance/complaints/index.html> [epa.gov]

From: Sir, Haley <Haley.Sir@mt.gov>
Sent: Monday, May 4, 2020 8:56 AM

To: Llamozas, Emilio <Llamozas.Emilio@epa.gov>; jmay@mt.gov

Subject: RE: Question about Helena NPDES permit

Hello Emilio,

I would think that within the year would be most realistic.

Haley Sir

Water Quality Permit Writer

Water Protection Bureau

(406) 444-4626

From: Llamozas, Emilio [<mailto:Llamozas.Emilio@epa.gov>]

Sent: Monday, May 4, 2020 8:25 AM

To: May, Jeff <jmay@mt.gov>

Cc: Sir, Haley <Haley.Sir@mt.gov>

Subject: [EXTERNAL] RE: Question about Helena NPDES permit

Jeff,

Thanks for the update.

Haley,

Do you have a ballpark timeframe for when the new NPDES permit will be issued? Do you think it will be this year or in a couple years? See emails below for background on these questions.

Thanks,

Emilio Llamozas

(303) 312-6407 phone

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<http://www.epa.gov/compliance/complaints/index.html> [epa.gov] [gccc01.safelinks.protection.outlook.com]

From: May, Jeff <jmay@mt.gov>

Sent: Monday, May 4, 2020 8:16 AM

To: Llamozas, Emilio <Llamozas.Emilio@epa.gov>

Cc: Sir, Haley <Haley.Sir@mt.gov>

Subject: RE: Question about Helena NPDES permit

Emilio:

Sorry for the delay in getting back to you. I just listened to your voicemail this morning.

The City of Helena's permit renewal is assigned to Haley Sir. She can provide you with an estimated timeline.

The City of Helena knew full well in 2017/2018 that it was unlikely their permit would be renewed anytime soon. They are very good at playing the game with bureaucratic delays and distractions all while doing as little as possible to comply with environmental regulations. They are something of a bad actor in my opinion. With that said, I guess at this point I would recommend waiting at least until the draft permit is put out for public notice before forcing the issue further.

Thanks,

Jeff May
MDEQ
406-444-5326

From: Llamozas, Emilio [<mailto:Llamozas.Emilio@epa.gov>]
Sent: Friday, May 1, 2020 10:37 AM
To: May, Jeff <jmay@mt.gov>
Subject: [EXTERNAL] Question about Helena NPDES permit

Hi Jeff,

I got your contact information from ICIS.

I worked in the NPDES Enforcement Program with EPA Region 8 in Denver, Colorado. In September 2017, EPA performed a Pretreatment audit of the City of Helena. One of the findings was that the City needed to update their local limits.

In one of their responses to us the City indicated that:

The Montana DEQ is currently in the process of writing the City of Helena's new NPDES Discharge Permit. Once the City receives this new permit with new discharge limits we will continue with completing our local limits. A local engineering firm has been hired for this task. We should be ready to begin implementing local limits by December 2018 depending on when we receive our new discharge permit. When we begin implementing local limits we will inform you.

I know that the permit expired on September 30, 2017 and has been administratively extended. Do you have a ballpark timeframe for when the new NPDES permit will be issued? Do you think it will be this year or in a couple years?

Thanks,

Emilio Llamozas
(303) 312-6407 phone

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<http://www.epa.gov/compliance/complaints/index.html> [epa.gov] [gcc01.safelinks.protection.outlook.com]
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